COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Addendum to the March 7, 2006 Statement of Legal and Factual Basis

Siegwerk, Inc.
Lynchburg, Virginia
Permit No. (SCRO-30595)

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Siegwerk, Inc. has applied for a Title V Operating Permit for its Lynchburg facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:_____ Date:

Air Permit Manager:_____ Date:

Regional Director:_____ Date:

FACILITY INFORMATION

Permittee
Siegwerk, Inc.
P.O. Box 10064
Lynchburg, VA 24506

Facility
Siegwerk, Inc.
4225 Murray Place
Lynchburg, VA 24501

County-Plant Identification Number.: 51-680-00123

PERMIT AMENDMENT INFORMATION

This Title V minor modification is being generated to remove the requirements of the MACT standard for Miscellaneous Organic Chemical Manufacturing in 40 CFR Part 63 Subpart FFFF from the Title V Permit issued on May 3, 2004 and modified on March 7, 2006. The two existing 2.6 MMBTU/hr natural gas/fuel oil fired boilers are not subject to the requirements of the boiler MACT, 40 CFR Part 63 Subpart DDDDD and Subpart A per 40 CFR 63.7506(C)(2).

On November 2, 2006, a request was received from Siegwerk to remove the MACT Subpart HHHHH from the Title V permit modified on March 7, 2006. This request was amended by letter received from Siegwerk on November 8, 2006 to use the minor permit modification procedures. This request also corrected the original request to remove MACT Subpart FFFF (Condition VIII) requirements from the permit.

The requirements from the MACT Subpart FFFF (Condition VIII of the March 7, 2006 modification) are removed from Title V permit. The facility is not a chemical manufacturing facility. It is an ink manufacturing facility that would be covered by MACT Subpart HHHHH Miscellaneous Coating Manufacturing. However, the facility received a State Operating Permit on October 31, 2006 limiting the HAPs emissions to less than 10 tons per year of any one HAP and less than 25 tons per year of any combination of HAPs. Therefore, there are no MACT Subpart HHHHH requirements included in this permit.

The applicable requirements for the boilers, storage tanks, process equipment, loading racks and soil vapor extraction and groundwater recovery systems have been retained in this permit,

Condition VIII of the May 3, 2004 permit (amended March 7, 2006) permit has been removed.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

This is a minor permit modification. The public participation requirements of 9 VAC 5-80-270 do not extend to minor permit modifications.

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
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STATEMENT OF LEGAL AND FACTUAL BASIS

Addendum to the May 3, 2004 Statement of Legal and Factual Basis

Siegwerk, Inc.
Lynchburg, Virginia
Permit No. (SCRO-30595)

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Siegwerk, Inc. has applied for a Title V Operating Permit for its Lynchburg facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

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Siegwerk, Inc.
4225 Murray Place
Lynchburg, VA 24501

County-Plant Identification Number.: 51-680-00123

PERMIT AMENDMENT INFORMATION

This Title V modification is being generated to incorporate the requirements of the MACT standard for Site Remediation in 40 CFR Part 63 Subpart GGGGG into the Title V Permit issued on May 3, 2004. The two existing 2.6 MMBTU/hr natural gas/fuel oil fired boilers are not subject to any requirements of t he boiler MACT 40 CFR Part 63 Subpart DDDDD or Subpart A per 40 CFR 63.7506(C) (2).

The requirements from the MACT Subpart GGGGG are stated in Conditions IX1. through IX6.

Limitations and Work Practice.
Condition IX2. states the limitations and work practice standards as requirement by the MACT.

Inspection and Monitoring
Condition IX3. states the MACT inspection and monitoring requirements.

Recordkeeping
Condition IX4. states the MACT recordkeeping requirements.

Reporting
Condition IX5. states MACT the reporting requirements.

Testing
Condition IX6. states MACT the testing requirements.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in the Lynchburg News & Advance from January 20, 2006 to February 19, 2006.

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Siegwerk, Inc.
Lynchburg, Virginia
Permit No. (SCRO-30595)

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Siegwerk, Inc. has applied for a Title V Operating Permit for its Lynchburg facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

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FACILITY INFORMATION

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Siegwerk, Inc.
P.O. Box 10064
Lynchburg, VA 24506

Facility
Siegwerk, Inc.
4225 Murray Place
Lynchburg, VA 24501

AFS ID No.: 51-680-00123

SOURCE DESCRIPTION

SIC Code: 2893 - Printing ink manufacturer

Main operations consist of batch-only production of rotogravure inks and varnishes. Siegwerk manufactures 4 colors of inks, two types each for a total of 8 different types of inks. They also make 2 ink extender products. Small amounts of special products like fragrance lacquers are produced on a per demand basis. Equipment and operations responsible for emissions are solvent storage tanks, ink storage tanks, mixing tanks, ink transfer, and solvent transfer.

Ingredients are stored, mixed, dissolved, filtered, and delivered by pipeline, tanker, tote, or drum. Toluene is the main solvent used in the manufacture of these inks (there is only a very small amount of xylene in the inks). Toluene is received by pipeline from R. R. Donnelley or by tanker.

The facility is a Title V major source of HAP, specifically toluene. This source is located in an attainment area for all pollutants, and is a PSD minor source. Siegwerk currently has Minor NSR Permits dated July 22, 1991 and February 5, 2003 covering portions of the facility.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following :

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
B#1	001	Burnham, Model V1111 - 7/2003	2.656 MMBtu/hr	-	-	-	-
B#2	001	Burnham, Model V1111 - 7/2003	2.656 MMBtu/hr	-	-	-	-
Storage Tanks							
TF1A	TF1A	Solvent 3600 V Storage - 1987	25,098 gallons	-	-	-	-
TF2A	TF2A	Solvent 3600 V Storage - 1987	25,098 gallons	-	-	-	-
Tank 69A	Tank 69A	Quad Black Ink Storage - 1992	4,018 gallons	-	-	-	July 22, 1991
Tank 69B	Tank 69B	Quad Black Ink Storage - 1992	4,018 gallons	-	-	-	July 22, 1991

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Tank 69C	Tank 69C	Quad Black Ink Storage - 1992	7,825 gallons	-	-	-	July 22, 1991
Tank 69D	Tank 69D	Quad Black Ink Storage - 1992	7,825 gallons	-	-	-	July 22, 1991
Tank 70A	Tank 70A	Quad Barium Ink Storage - 1992	5,922 gallons	-	-	-	July 22, 1991
Tank 70B	Tank 70B	Quad Rubine Ink Storage - 1992	5,922 gallons	-	-	-	July 22, 1991
Tank 70C	Tank 70C	Quad Blue Ink Storage - 1992	5,922 gallons	-	-	-	July 22, 1991
Tank 70D	Tank 70D	Quad Blue Ink Storage - 1992	5,922 gallons	-	-	-	July 22, 1991
Tank 71B	Tank 71B	Quad Black Ink Storage - 1992	9,835 gallons	-	-	-	July 22, 1991
Tank 71C	Tank 71C	Extender Storage 03015 - 1992	9,835 gallons	-	-	-	July 22, 1991

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Tank 75	Tank 75	Resin 2742 Storage - 1995	20,080 gallons	-	-	-	-
LR1	LR1	Loading Rack - 1977	150 gpm	-	-	-	-
LR2	LR2	Loading Rack - 1992	150 gpm	-	-	-	July 22, 1991
Remediation Equipment							
S1,S2	S1	Soil Vapor Extraction and Groundwater Recovery Systems - 2003	200 acfm	Thermal Catalytic Oxidizer	CS1	VOC	February 5, 2003

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

EMISSIONS INVENTORY

Emissions are summarized in the following tables.

2002 Actual Emissions

	2002 Criteria Pollutant Emission in Tons/Year	
Emission Unit	VOC	Toluene
Facility	16.1	16.1

EMISSION UNIT APPLICABLE REQUIREMENTS - Boilers (Ref. Nos. B#1 and B#2)

Limitations

The natural gas and distillate oil fired 2.656 MMBtu/hr boilers are not subject to NSR permitting since they are less than 10 MMBtu/hr per 9 VAC 5-80-1320 B. However, they are still subject to existing source rules in (Rule 4-8) for PM and SO_2 and to the new and modified source standard for opacity in 9 VAC 5-50-80.

Monitoring

A weekly observation for the presence of visible emissions from the boiler stacks will be required. A 6 minute visible emissions evaluation (VEE) using Method 9 is required if visible emissions are present. A 60 minute VEE will be required if one or more readings from the 6 minute VEE exceed 20% opacity.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. Additionally, the permittee is required to keep records of the origin and value of emission factors used for calculating emission rates.

Testing

The permit does not require source tests for this equipment. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

No reporting is currently required for the boilers.

EMISSION UNIT APPLICABLE REQUIREMENTS - Storage Tanks (Ref. Nos. Tank 69A, Tank 69B, Tank 69C, Tank 69D, Tank 70A, Tank 70B, Tank 70C, Tank 70D, Tank 71B, and Tank 71C) and Loading Rack (Ref. No. LR2)

Limitations

The indicated tanks and loading rack are governed by a NSR permit dated July 22, 1991. The tanks and loading rack are limited to a throughput of 6,100,000 gallons of ink by this permit and this requirement is carried forward into the Title V. The NSR and Title V permits also limit hourly, daily, and annual VOC emissions from the equipment.

Monitoring

The permittee will monitor and record the ink throughput on a monthly basis for the tanks and the loading rack.

There is no requirement for monitoring visible emissions. Operation of the equipment will not result in visible emissions.

Recordkeeping

The permittee is required to keep records of the origin and value of emission factors used for calculating emission rates in addition to ink throughput records.

Testing

The permit does not require source tests for this equipment. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

No reporting is currently required for the storage tanks or loading rack.

EMISSION UNIT APPLICABLE REQUIREMENTS - Storage Tanks (Ref. Nos. TF1A, TF2A, and Tank 75)

Recordkeeping

The permittee is required to keep records showing the dimensions of each storage vessel and an analysis for each tank showing the capacity of the vessel in order to comply with NSPS Subpart Kb. Additionally, the permittee is required to keep records of the origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations. There are no other applicable requirements for these tanks.

EMISSION UNIT APPLICABLE REQUIREMENTS - Loading Rack (Ref. No. LR1)

Recordkeeping

The permittee is required to keep records of the origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations. There are no other applicable requirements for these tanks.

EMISSION UNIT APPLICABLE REQUIREMENTS - Soil Vapor Extraction and Groundwater Recovery Systems (Ref. Nos. S1 and S2)

Limitations

VOC emissions from the soil vapor and groundwater recovery systems are required to be controlled by a thermal catalytic oxidizer with recuperative heat recovery, and the thermal catalytic oxidizer is required to maintain a minimum control efficiency of 95%. Additionally, the thermal catalytic oxidizer is required to maintain a minimum oxidizer inlet temperature of 600 ^{o}F. VOC emissions from the operation of the soil vapor extraction and groundwater recovery system are limited to 0.7 lbs/hr and 2.2 tons/yr and visible emissions are limited to 5% opacity.

Monitoring

The thermal catalytic oxidizer is required to be equipped with devices to continuously measure catalytic oxidizer gas temperature both immediately upstream and downstream of the catalyst bed. These monitoring devices must be in operation when the soil vapor and groundwater recovery systems are in operation and must be observed daily by the permittee. Additionally, activity tests must be conducted on the catalyst for activity level in percent of VOC destruction on an annual basis. Finally, a weekly observation for the presence of visible emissions from the thermal catalytic oxidizer stack will be required. A 6 minute visible emissions evaluation (VEE) using Method 9 is required if visible emissions are present. A 60 minute VEE will be required if one or more readings from the 6 minute VEE exceed 5% opacity.

Recordkeeping

The following records are required to be kept for the soil vapor and groundwater recovery system:

a. Annual hours of operation of soil vapor extraction and groundwater recovery system, calculated monthly as the sum of each consecutive 12 month period.

b. Operation and control device monitoring records for the catalytic oxidizer.

c. The origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations.

d. Results of weekly opacity observations, along with details regarding any necessary corrective actions.

Testing

The permit does not require stack tests for this equipment. However, the permit does require annual activity testing of the catalyst in the thermal catalytic oxidizer. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

No reporting is currently required for the soil vapor extraction and groundwater recovery system.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.1-20.01:2 and §10.1-1185 of the *Code of Virginia,* and the “Department of Environmental Quality Agency Policy Statement NO. 3-2001”.

This general condition cites the sections that follow:
9 VAC 5-80-80. Application
9 VAC 5-80-140. Permit Shield
9 VAC 5-80-150. Action on Permit Applications

F. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

J. Permit Modification

This general condition cites the sections that follow:
9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources
9 VAC 5-80-190. Changes to Permits.
9 VAC 5-80-260. Enforcement.
9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources
9 VAC 5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

FUTURE APPLICABLE REQUIREMENTS

The facility is a major source of hazardous air pollutants (toluene). The facility is currently subject to the MACT standard for Miscellaneous Organic Chemical Manufacturing in 40 CFR Part 63 Subpart FFFF (MACT Subpart FFFF). However, the compliance date for existing sources is not until November 10, 2006. MACT Subpart FFFF does state though that some notifications must be submitted before this date, according to the schedule in 40 CFR 63.2515 and in 40 CFR Part 63 Subpart A. MACT Subpart FFFF requirements are included in the Title V.

The facility is also currently subject to the MACT standard for Site Remediation in 40 CFR Part 63 Subpart GGGGG (MACT Subpart GGGGG). However, the compliance date for existing sources is not until October 9, 2006. This MACT also requires that some notifications be submitted before the compliance date.

INAPPLICABLE REQUIREMENTS

The facility is not currently subject to the requirements in 40 CFR Part 64 Compliance Assurance Monitoring (CAM). While the soil vapor and groundwater recovery systems which are controlled by a thermal catalytic oxidizer have potential pre-control device emissions of toluene in excess of 10 tpy, 40 CFR 64.2 (b) exempts emission units that are subject to "Emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act." Since the soil vapor and groundwater recovery systems are subject to MACT GGGGG (as discussed above) and MACT GGGGG was proposed on July 30, 2002, the soil vapor and groundwater recovery systems are not subject to CAM. The remainder of the emission units at the facility are not subject to CAM since these units do not use a control device to achieve compliance with an emission limitation or standard.

The facility is not currently subject to the MACT standard for Miscellaneous Coating Manufacturing in 40 CFR Part 63 Subpart HHHHH (MACT Subpart HHHHH). While the definition of coating in 40 CFR 63.8105 includes ink, 40 CFR 63.7985 (a) (4) exempts those sources that are subject to another Subpart of Part 63.

The facility is not currently subject to the MACT standard for Offsite Waste and Recovery Operations in 40 CFR Part 63 Subpart DD (MACT Subpart DD). While the facility does receive recovered toluene from a nearby customer, the toluene is received as a raw material and does not require recycling, reprocessing, or refining by Siegwerk to remove physical or chemical impurities to obtain raw material grade toluene.

As of October 15, 2003, 40 CFR Part 60 Subpart Kb (NSPS Kb) no longer applies to storage vessels smaller than 75 m3 (19,813 gallons). Per an EPA NSPS determination by Brian Beals dated 10/17/95, NSPS Kb applicability for compartmentalized tanks is based on the size of each individual compartment when the individual compartments are designed to operate independently. Therefore, Tanks TF3A, TF3B, TF4A, TF5A, TF5B, TF7A, TF7B, TF8A, and TF8B are no longer subject to NSPS Kb.

The facility is not currently subject to Rule 4-25, Emission Standards for Volatile Organic Compound Storage and Transfer Operations. Per 9 VAC 5-40-3410 C.2, facilities using only volatile organic compounds with a vapor pressure less than 1.5 psia under actual storage and transfer conditions are exempt from this Article. The actual vapor pressure of volatile organic compounds at Siegwerk are expected to be less than 0.5 psia.

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 3 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction

can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted	Rated Capacity
Tank 7	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 8	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 9	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 14	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 15	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 23	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 24	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 25	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 43	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 44	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 45	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 52	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 53	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tf6B	Storage Tank	5-80-720 B.2.	VOC (toluene)	5005 gals.
Tank 10	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted	Rated Capacity
Tank 11	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 12	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 13	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 21	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 22	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tf6C	Storage Tank	5-80-720 B.2.	VOC (toluene)	5005 gals.
Silo 1	Silo	5-80-720 B.1.	Particulate	7500 lbs.
Silo 2	Silo	5-80-720 B.1.	Particulate	7500 lbs.
Silo 3	Silo	5-80-720 B.1.	Particulate	7500 lbs.
Tf6D	Storage Tank	5-80-720 B.2.	VOC (toluene)	10011 gals.
54	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 26	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 40	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 41	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tf4B	Storage Tank	5-80-720 B.2.	VOC (toluene)	10011 gals.
Tf6A	Storage Tank	5-80-720 B.2.	VOC (toluene)	5005 gals.
Tank 71A	Storage Tank	5-80-720 B.2.	VOC	3983 gals.
DT/Y1	Storage Tank	5-80-720 B.2.	VOC (toluene)	729 gals.
DT/Y2	Storage Tank	5-80-720 B.2.	VOC (toluene)	724 gals.
DT/R1	Storage Tank	5-80-720 B.2.	VOC (toluene)	569 gals.
DT/R2	Storage Tank	5-80-720 B.2.	VOC (toluene)	724 gals.
DT/R3	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
DT/B1	Storage Tank	5-80-720 B.2.	VOC (toluene)	724 gals.
DT/B3	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted	Rated Capacity
DT/K1	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
DT/K2	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
DT/K4	Storage Tank	5-80-720 B.2.	VOC (toluene)	795 gals.
M-Y1	Mixer	5-80-720 B.2.	VOC (toluene)	900 liters
M-Y2	Mixer	5-80-720 B.2.	VOC (toluene)	1500 liters
M-R1	Mixer	5-80-720 B.2.	VOC (toluene)	1500 liters
M-R2	Mixer	5-80-720 B.2.	VOC (toluene)	1500 liters
M-R3	Mixer	5-80-720 B.2.	VOC (toluene)	450 liters
M-B1	Mixer	5-80-720 B.2.	VOC (toluene)	900 liters
M-B3	Mixer	5-80-720 B.2.	VOC (toluene)	900 liters
M-K1	Mixer	5-80-720 B.2.	VOC (toluene)	900 liters
M-K4	Mixer	5-80-720 B.2.	VOC (toluene)	1500 liters
Tank 19	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 20	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 48	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 34	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 35	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 74	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 28	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 49	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 36	Storage Tank	5-80-720 B.2.	VOC (toluene)	2414 gals.
Tank 42	Storage Tank	5-80-720 B.2.	VOC (toluene)	1122 gals.
Tank 2	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 3	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted	Rated Capacity
Tank 5	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 6	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 1	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 4	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
D8/Y	Dissolver	5-80-720 B.2.	VOC (toluene)	1715 gals.
D11/Y	Dissolver	5-80-720 B.2.	VOC (toluene)	1966 gals.
D1/R3	Dissolver	5-80-720 B.2.	VOC (toluene)	840 gals.
D9/R	Dissolver	5-80-720 B.2.	VOC (toluene)	2828 gals.
D10/R	Dissolver	5-80-720 B.2.	VOC (toluene)	1715 gals.
D6/B	Dissolver	5-80-720 B.2.	VOC (toluene)	1726 gals.
D7/B	Dissolver	5-80-720 B.2.	VOC (toluene)	1920 gals.
D2/B2	Dissolver	5-80-720 B.2.	VOC (toluene)	840 gals.
D3-1H	Dissolver	5-80-720 B.2.	VOC (toluene)	771 gals.
D4-1H	Dissolver	5-80-720 B.2.	VOC (toluene)	647 gals.
D1/K1	Dissolver	5-80-720 B.2.	VOC (toluene)	1266 gals.
D1/K2	Dissolver	5-80-720 B.2.	VOC (toluene)	840 gals.
D12/K4	Dissolver	5-80-720 B.2.	VOC (toluene)	1851 gals.
D1	Dissolver	5-80-720 B.2.	VOC (toluene)	1472 gals.
D2	Dissolver	5-80-720 B.2.	VOC (toluene)	1472 gals.
D3	Dissolver	5-80-720 B.2.	VOC (toluene)	1698 gals.
D4	Dissolver	5-80-720 B.2.	VOC (toluene)	1801 gals.
D5	Dissolver	5-80-720 B.2.	VOC (toluene)	757 gals.
D6A	Dissolver	5-80-720 B.2.	VOC (toluene)	1228 gals.
D6B	Dissolver	5-80-720 B.2.	VOC (toluene)	1228 gals.

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted	Rated Capacity
D1/F6	Dissolver	5-80-720 B.2.	VOC (toluene)	1238 gals.
D2/F6	Dissolver	5-80-720 B.2.	VOC (toluene)	1415 gals.
D1A	Dissolver	5-80-720 B.2.	VOC (toluene)	515 gals.
D1B	Dissolver	5-80-720 B.2.	VOC (toluene)	515 gals.
Tank 16	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 27	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 30	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 31	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 37a	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 37b	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 46	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 17	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 18	Storage Tank	5-80-720 B.2.	VOC (toluene)	641 gals.
Tank 47	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 32	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 33	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 29	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 73	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 38	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 39	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 50	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 51	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.
Tank 72	Storage Tank	5-80-720 B.2.	VOC (toluene)	1431 gals.

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted	Rated Capacity
TF3A	Storage Tank	5-80-720 B.2.	VOC (toluene)	12,549 gals.
TF3B	Storage Tank	5-80-720 B.2.	VOC (toluene)	12,549 gals.
TF4A	Storage Tank	5-80-720 B.2.	VOC (toluene)	15,017 gals.
TF5A	Storage Tank	5-80-720 B.2.	VOC (toluene)	12,549 gals.
TF5B	Storage Tank	5-80-720 B.2.	VOC (toluene)	12,549 gals.
TF7A	Storage Tank	5-80-720 B.2.	VOC (toluene)	12,549 gals.
TF7B	Storage Tank	5-80-720 B.2.	VOC (toluene)	12,549 gals.
TF8A	Storage Tank	5-80-720 B.2.	VOC (toluene)	12,549 gals.
TF8B	Storage Tank	5-80-720 B.2.	VOC (toluene)	12,549 gals.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit was placed on public notice in the Lynchburg News & Advance on March 15, 2004 and comments were received for 30 days.